

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ALISON M. PLAHITKO,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:25-cv-00468-RLY-KMB
)	
COMMUNITY HEALTH NETWORK, INC.,)	
)	
Defendant.)	

DEFENDANT’S PRELIMINARY WITNESS AND EXHIBIT LIST

Defendant, Community Health Network, Inc. (“Community” or “Defendant”), by counsel, hereby files its preliminary lists of witnesses and exhibits that may be relied upon by Defendant at the trial of this action, other than witnesses and exhibits to be used solely for the purpose of impeachment or rebuttal, as follows:

PRELIMINARY WITNESS LIST

1. Teresa Donaldson
Director of Benefits
Community Health Network, Inc.
c/o Ice Miller LLP
2. Joseph Anderson
Former Vice President, Total Rewards
Community Health Network, Inc.
c/o Ice Miller LLP
3. Sylvia Burnett
Director of Human Resources
Community Health Network, Inc.
c/o Ice Miller LLP
4. Julie DeVine
Lead Benefits Specialist
Community Health Network, Inc.
c/o Ice Miller LLP

5. Michelle Mahaffey
Executive Vice President, Chief Human Resources Officer
Community Health Network, Inc.
c/o Ice Miller LLP
6. Laura Shapiro
Senior Benefits Analyst
Community Health Network, Inc.
c/o Ice Miller LLP
7. Ramona Stowe
Senior Benefit System Administrator
Community Health Network, Inc.
c/o Ice Miller LLP
8. Courtney Shoemaker
Senior Director, Global HR Systems & Payroll
Community Health Network, Inc.
c/o Ice Miller LLP
9. All persons with relevant information deposed prior to trial;
10. All persons with relevant information identified or referenced in any document produced in response to an interrogatory, request for admission, or request for production of documents in this matter;
11. Any individuals with relevant information identified by Plaintiff in her preliminary or final witness list, initial disclosures, discovery requests or responses to discovery;
12. All persons with relevant information identified or referenced in a deposition or deposition exhibit in this action;
13. All persons needed to authenticate business or other records to be used as evidence at trial; and
14. All persons needed to verify, admit, introduce, and/or lay foundation for any documents to be used at trial.

In the event it is subsequently determined other or additional witnesses will be called to testify for Defendant, other than for purposes of impeachment or rebuttal, Plaintiff will be so advised. Defendant hereby reserves the right to add to or otherwise amend the foregoing list of witnesses after the completion of discovery. Defendant also reserves the right to call as a witness

any person, whether designated or not, for the purpose of providing impeachment or rebuttal evidence.

PRELIMINARY EXHIBIT LIST

1. Relevant documents within Plaintiff's personnel file;
2. Relevant documents relating to the assessment of Plaintiff's job performance and behavior, including but not limited to the discharge document issued for Plaintiff on January 24, 2025;
3. Policies and procedures of Defendant pertinent to this action, including but not limited to PRIIDE Values; Code of Conduct and Business Ethics; Information Security and Confidential Information; Appropriate Use of Network Assets; Corrective Action Policy; Network Data Classification Policy; Administrative, Technical, and Physical Safeguards; and Defendant's policies and procedures related to the Family Medical Leave Act;
4. Documents regarding relevant incidents and events involving Plaintiff, and communications regarding the same;
5. Documents reflecting relevant conversations and/or relevant communications with, from, or relating to Plaintiff;
6. Documents relating to Defendant's treatment of similarly situated individuals employed by Defendant, if any, as may become relevant;
7. Documents relating to Plaintiff's compensation and benefits;
8. Documents relating to Plaintiff's duties and job responsibilities;
9. All relevant documents produced by Plaintiff in response to any requests for production of documents issued by Defendant;
10. All relevant documents produced by Defendant in response to any requests for production of documents from Plaintiff;
11. All relevant documents produced by nonparties in response to a subpoena, request for production, or some other request;
12. Any and all discovery responses served by Plaintiff on Defendant in this matter, including, but not limited to, Plaintiff's answers to Defendant's interrogatories, Plaintiff's responses to Defendant's requests for production of documents, and Plaintiff's responses to Defendant's requests for admission, if any;

13. Any and all discovery responses served by Defendant on Plaintiff in this matter, including, but not limited to, Defendant's answers to Plaintiff's interrogatories, Defendant's responses to Plaintiff's requests for production of documents, and Defendant's responses to Plaintiff's requests for admission, if any;
14. Any and all pleadings and other documents filed or served in this matter;
15. Any and all relevant exhibits to any deposition taken in this action;
16. Any and all relevant documents listed in Plaintiff's preliminary or final exhibit lists and/or initial disclosures; and
17. Demonstrative exhibits (to be determined).

In the event it is subsequently determined other or additional exhibits will be used by Defendant, other than for purposes of impeachment or rebuttal, Plaintiff will be so advised. Defendant hereby reserves the right to add to, delete from, or otherwise amend the foregoing list of exhibits after the completion of discovery, and to present any and all documentary evidence necessary to address, impeach, or rebut matters put into evidence by Plaintiff at trial.

Respectfully submitted,

ICE MILLER LLP

/s/ Phillip J. Jones

Charles E. Bush, II, Attorney No. 31252-64

Phillip J. Jones, Attorney No. 36859-53

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